

From: [ANDERSON Jim M](#)
To: ['Budai, Christine M NWP'](#); [Mark Ader/R10/USEPA/US@EPA](#); [Lori Cora/R10/USEPA/US@EPA](#); [Rene Fuentes/R10/USEPA/US@EPA](#); [rose@yakamafish-nsn.gov](#); [BAYUK Dana](#)
Cc: [Deb Yamamoto/R10/USEPA/US@EPA](#); [Kristine Koch/R10/USEPA/US@EPA](#); [Gross, Michael J NWP](#); [Shaw, Travis C NWS](#); [Rule, Rebecca A NWS](#); [Gelinis, Sharon L NWS](#); [Robison, Mac E NWP](#); [Chip Humphrey/R10/USEPA/US@EPA](#); [Dan Phalen/R10/USEPA/US@EPA](#)
Subject: RE: Moorings Upland-Draft Proposed Plan (UNCLASSIFIED)
Date: 08/28/2011 06:59 AM

Chris,

DEQ reviewed the Corps' DRAFT Proposed Plan for the US Mooring site. Overall, the Plan is comprehensive & well written. Furthermore, DEQ agrees with the Plan's conclusions. The Plan largely does what I think it should do..., be a concise yet comprehensive description of what was done at the site, why the Corps/EPA is making the decisions they're making, & what those decisions are. The Plan was also written contemplating the intended audience..., both technical/professional/legal folks..., & citizens & general stakeholders. Good job!

Again..., as an introductory note..., DEQ's involvement in the US Mooring project has been limited as described in my 8/12/11 e-mail to you.

I have a number of comments on the Plan. Some of my comments are very minor so I apologize if you think I'm nit picking.

- 1) Public Outreach with the Portland Harbor (PH) Community Advisory Group (CAG)- If it's hasn't all ready been done..., I think EPA &/or the Corps should contact the PH CAG & try to get on the agenda for the Wed nite 9/14/11 CAG mtg to give a brief (10-15 minute) description of this project & chance for community involvement. This could be delayed to a CAG mtg later in the fall, but my suggestion is the sooner the better.
- 2) What are the "Contaminants of Concern" (COC) and "Contaminants of Potential Concern" (COPC), page 2 text box)- 1st, there isn't any kind of description preceding the text box of what a COPC or COC is. COPCs & COCs are not defined in the Glossary either. I think the Plan should describe these terms for the reader.

Very briefly, COPCs are contaminants that pass thru a risk screening process..., i.e., contaminants that exceed generic screening-levels values (SLVs). SLVs such as EPA's Regional Screening Levels (RSLs) or DEQ's risk-based concentrations (RBCs). Typically SLVs aren't meant to be cleanup values, rather they're simply generic, off-the-shelf values that essentially act as a threshold for possible concern. Exceedance of SLVs is a preliminary indicator of unacceptable risk. If you're below these SLVs, it isn't likely the contamination poses significant threat, & additional work will likely not be necessary. If you exceed these SLVs, you could use them as cleanup values (but they're typically conservative..., i.e., low)..., or more likely

you'd go into a site-specific risk assessment (i.e., baseline-risk assessment (BRA)) to develop site-specific RBCs. Any contaminants that exceed risk levels as defined by a BRA would be considered COCs.

2nd, in the 1st sentence of the text box, the Plan essentially states the acceptable risk level for humans to carcinogens is 10^{-4} . The Plan don't define what 10^{-4} is (i.e., excess cancer risk). Furthermore, if you're looking at Oregon Cleanup rules as ARARs, our definition of acceptable risk from individual carcinogens is 10^{-6} . EPA uses a 10^{-4} to 10^{-6} range. In my 7/8/11 e-mail to you regarding State ARARs, I said the State's most important specific Cleanup Rules for US Moorings are OAR 340-122-040 (cleanup standards) and OAR 340-122-115 (definitions). 10^{-6} is described in OAR 340-122-115 (1).

- 3) JSCS SLVs (last sentence, 1st paragraph, page 3)- The Plan's description of JSCS SLVs isn't bad, but could be improved. JSCS SLV are risk-based values specifically protective of receptors exposed to river sediment (including transition zone water, TZW) or the river itself (i.e., water column). They really don't contemplate terrestrial receptors being exposed to upland environmental media (e.g., soil). That's done in the upland risk assessment.
- 4) No Eco Risk Assessment (ERA, page 3)- It might help if the Plan explained why no ERA was conducted for the site. I see on page 5, the Plan states no upland eco receptors due to lack of habitat. It might be good to state "no habitat" on this page also.

FYI, DEQ doesn't agree that the Site doesn't provide any habitat. We do agree the majority of the site is developed & doesn't provide habitat, but the thin riverbank area is part of a major bird flyway & could also provide limited habitat to terrestrial eco receptors. I think a possible resolution to our comment would be to simply back-off the statement in the Plan that says "no upland receptors due to lack of habitat". Instead, perhaps the Corps could develop an argument stating that there is very limited habitat in the riverbank area at the Site, & that that limited habitat likely doesn't support a population or community.

- 5) RSLs rather than PRGs (page 4)- Pretty minor point..., but I think the Region 6 screening numbers are called "Regional Screening Levels" (RSLs), not PRGs.
- 6) "Ground Water" (text box, page 4 & "Alternative 1", page 6)- Be consistent with the spelling of "groundwater" vs "ground water".

- 7) Hyphenate 2 or more words that act together to modify another word- Chris, this may be pretty picky, but you should consider reviewing the document to correct these minor errors. For example:
- 7.1 "post-remedy" not "post remedy" (bottom of left column, page 5).
 - 7.2 "storm-water drainage" or "stormwater drainage" not "storm water drainage" (1st paragraph, right column, page 5). 2 corrections needed in the paragraph, & elsewhere in the Plan.
 - 7.3 "ten-feet landward" not "ten feet landward" (1st paragraph, right column, page 5)
 - 7.4 "five-year reviews" not "five year review" (middle paragraph, right column, page 5)
 - 7.5 "30-year evaluation" not 30 year evaluation" (middle paragraph, right column, page 5)
 - 7.6 "response-action assurance" not "response action assurance" (last line, right column, page 5)
- 8) Typo (right column, 1st paragraph, last sentence, page 9)- Remove "treat".
- 9) Diction (1st sentence in "COMMUNITY PARTICIPATION", page 10)- I think "an" should be replaced by "and".
- 10) State/Support Agency Acceptance (page 10)- I think the text you have in this section is fine. Do you need anything else from DEQ?

Chris, good job!

Jim Anderson
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-----Original Message-----

From: Budai, Christine M NWP [<mailto:Christine.M.Budai@usace.army.mil>]
Sent: Wednesday, August 17, 2011 4:22 PM
To: Mark Ader; Lori Cora; Rene Fuentes; rose@yakamafish-nsn.gov; BAYUK Dana
Cc: Deb Yamamoto; koch.kristine@epa.gov; ANDERSON Jim M; Gross, Michael J NWP; Shaw, Travis C NWS; Rule, Rebecca A NWS; Gelinas, Sharon L NWS; Robison, Mac E NWP
Subject: RE: Moorings Upland-Draft Proposed Plan (UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

All,
This is a reminder that the review comments to the attached are due NLT
26 Aug.
Thank you,
Chris Budai
Project Manager
503-808-4725

-----Original Message-----

From: Budai, Christine M NWP
Sent: Wednesday, July 27, 2011 7:33 PM
To: Mark Ader; Lori Cora; Rene Fuentes; rose@yakamafish-nsn.gov; BAYUK
Dana
Cc: Deb Yamamoto; koch.kristine@epa.gov; ANDERSON Jim M; Gross, Michael
J NWP; Shaw, Travis C NWS; Rule, Rebecca A NWS; Gelinas, Sharon L NWS;
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All,
Attached is the Draft Proposed Plan for the U.S. Government Moorings
Upland for your review. Please provide comments to me NLT August 26,
2011 and preferably sooner if possible. There are some areas
highlighted in yellow to indicate information, such as dates or
locations, that will be filled in when that information is available.
Thank you,
Chris Budai
Project Manager
503-808-4725

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